REMARKS/ARGUMENTS

Claims 1-20 are pending in this Application.

Claims 1-3, 7, 9, 10-12, 16, and 17 are currently amended. Applicants submit that support for the claim amendments can be found throughout the specification and the drawings.

Claims 1-20 remain pending in the Application after entry of this Amendment. No new matter has been entered.

In the Office Action, claims 1-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,584,459 to Chang et al. (hereinafter "Chang"), in view of U.S. Patent No. 5,884,321 to Meffert (hereinafter "Meffert").

Claim Rejections Under 35 U.S. C. § 103(a)

Applicants respectfully traverse the rejections to claims 1-20 and request reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) based on Chang in view of Meffert. The Office Action alleges that the combination of references teach or disclose all of the claimed limitations of the corresponding claims and that one having ordinary skill in that art at the time of the invention would have been motivated to incorporate the teachings of Chang with the teachings of Meffert.

Applicants, however, respectfully submit that a prima facie case of obviousness has not been established by the evidence presented in the Office Action. In order to establish a prima facie showing of obviousness, three requirements must be satisfied: all limitations of a pending claim must be expressly or impliedly disclosed by prior art references; there must be a suggestion or motivation in the art for the ordinarily skilled artisan to combine the limitations; and there must be a reasonable expectation of success in making such a combination. (M.P.E.P. § 2143).

Applicants respectfully submit that Chang and Meffert, either individually or in combination, fail to teach or suggest one or more of the claim limitations recited in each of claims 1-20.

For example, amended claim 1 recites the feature of "generating a set of database tables in response to the user input identifying the one or more elements in the unstructured data

as query elements, the set of database tables configured to translate a query element to an associated user-identified element in the unstructured data." The Office Action acknowledges that Chang fails to disclose the above-recited limitation. The Office Action attempts to rely on the teachings of Meffert which allegedly use database tables to link database records to images to cure the acknowledged deficiencies of Chang. However, Applicants respectfully submit Meffert also fails to teach or suggest the above-recited feature.

As recited in claim 1, one or more database tables are generated in response to user input identifying one or more elements in unstructured data as query elements. The Office Action alleges that Meffert discloses the above-recited feature in Col. 7, lines 25-35 by stating that a user selection creates new database tables to link. Applicants respectfully submit that creating database tables in Meffert is substantially different from generating one or more database tables in response to user input identifying one or more elements in unstructured data as query elements as recited in claim 1.

In Col. 7, lines 25-35, Meffert discloses that new database tables are created in external database for storage of data necessary to link images to selected entries in the external databases. However, Meffert does not disclose that the new database tables are created in response to a user selection as alleged in the Office Action. Meffert does not state who or what selects the entries in the external database, but merely requires that they be selected. Thus, Meffert fails to disclose creating new database tables in response to user input as recited in claim 1. Meffert further fails to teach or suggest generating database tables as recited in claim 1 in response to user input identifying one or more elements in unstructured data as query elements. Meffert simply creates the new database tables to store data necessary to link images to selected entries in the external database. Thus, Meffert fail to teach or suggest one or more database tables are generated as recited in claim 1 in response to user input identifying one or more elements in unstructured data as query elements.

Moreover, the Office Action alleges that one ordinarily skilled in the art would combine Chang and Meffert to improve the system of Chang to "bridge gaps between platforms" that "tracks links across platforms." However, even if the system of Chang was combined as suggested in the Office Action with Meffer to "bridge gaps between platforms," the resulting

combination would still not render the feature of "generating a set of database tables in response to the user input identifying the one or more elements in the unstructured data as query elements" as recited in claim 1, because Meffert merely creates new database tables to link database records to stored images. (Meffert: Col. 2, lines 4-9).

Applicants further respectfully submit that Chang and Meffert, either individually or in combination, fail to teach or suggest generating a set of database tables in response to user input identifying one or more elements in unstructured data as query elements where the set of database tables are configured to translate a query element to an associated user-identified element in the unstructured data as recited in claim 1. Chang simply suggests providing data structures that function as direct indexes into fields of database tables that represent the structure of an XML document. (Chang: FIG. 10). Meffert simply suggests that because a database record and an image are linked, the image can be retrieved at the same time the database record is retrieved. Thus, combining Chang and Meffert would merely result in providing the direct indexes of Chang on the newly created database tables of Meffert that contain the data necessary to link database entries to images. However, the above combination is still substantially different from database tables that translate a query element to an associated user-identified element in unstructured data as recited in claim 1.

Accordingly, Applicants respectfully submit that Chang and Meffert, either individually or in combination, fail to teach or suggest each and every claim limitation recited in claim 1.

Claims 2-20

Applicants respectfully submit that independent claims 9, 11, and 16 are allowable for at least a similar rationale as discussed above for the allowability of claim 1, and others. Applicants respectfully submit that dependent claims 2-8, 10, 12-15, and 17-20 that depend directly and/or indirectly from the independent claims 1, 9, 11, and 16 respectively, are also allowable for at least a similar rationale as discussed above for the allowability of the independent claims. Applicants further respectfully submit that the dependent claims recite additional features that make the dependent claims allowable for additional reasons.

Appl. No. 10/731,604
Amdt. dated November 6, 2007
Reply to Office Action of August 10, 2007

PATENT

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,

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